

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**IN RE:** : Chapter 13  
**Tavani, Peter E.**  
**Debtors/ Respondents** : 19-10709

**Answer to Motion of  
For Relief from Automatic Stay**

Debtor, Peter E. Tavani, by and through his undersigned attorney, hereby provides the following answers to the Motion for Relief from Stay filed by Glenhardie Condominium Association ("Movant"). These responses are made without prejudice to debtor's right to present additional facts or contentions at trial based upon information hereinafter obtained or evaluated. Debtor specifically reserves the right to supplement or amend his responses or present additional facts and contentions at a later date to any of the answers given.

1. Denied. The allegation contained herein are directed to a party other than the answering debtor, and they are denied as no response is required.

2. Denied. Denied The averments contained in this Paragraph consist of summarization of documents that speak for themselves and they are denied as no response is required.

3. Denied. The allegation is a legal conclusion of law to which no answer is required.

4. - 5. Denied. Denied The averments contained in these Paragraphs consist of summarization of documents that speak for themselves and they are denied as no response is required.

6. -10. Denied. Denied The averments contained in these Paragraphs consist of summarization of documents that speak for themselves and they are denied as no response is required. By way of further response, the allegations are denied, and the debtor avers, that he can neither admit nor deny the allegations because Debtor has no personal knowledge of the accuracy of such statement.

11. Denied. The allegation is a legal conclusion of law to which no answer is required.

For the reasons set forth above, among others, and based on this Court's authority under the Bankruptcy Code, the Debtor prays that the motion be denied and such other relief as is just and proper. The Debtor specifically reserves the right to supplement the answer at or prior to the hearing thereon.

Dated: January 13, 2020

"/s/" Mitchell J. Prince  
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